

ISMAIL J. RAMSEY (CABN 189820)  
United States Attorney  
MICHELLE LO (NYRN 4325163)  
Chief, Civil Division  
ELIZABETH D. KURLAN (CABN 255869)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7298  
Facsimile: (415) 436-6748  
Elizabeth.Kurlan@usdoj.gov

Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SOHEILA FOTOVATAHMADI, *et al.*,  
Plaintiffs,

v.

ANTONY J. BLINKEN, in his official capacity  
as Secretary of the U.S. Department of State, *et al.*,  
Defendants.

Case No. 3:24-cv-04509 LJC

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS' RESPONSE TO PLAINTIFFS'  
COMPLAINT; AND ~~PROPOSED~~ ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time within which the Defendants must serve their answer or otherwise respond in the above-entitled action. Defendants will file their response on or before December 3, 2024.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 5. Currently, Defendants must file a motion for summary judgment by 120 days after the complaint was served, or December 3, 2024. In view of the agreed-upon extension for Defendants' response to the complaint, the parties request that Defendants must file their motion for summary judgment by February 3, 2025.

1 Dated: September 6, 2024

Respectfully submitted,<sup>1</sup>

2 ISMAIL J. RAMSEY  
3 United States Attorney

4 /s/ Elizabeth D. Kurlan  
5 ELIZABETH D. KURLAN  
6 Assistant United States Attorney

Attorneys for Defendants

7 Dated: September 6, 2024

8 /s/ Jennifer Nimer  
9 JENNIFER NIMER  
10 Pro Hac Vice

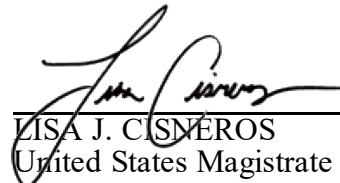
11 PARIS E. SCOTT  
12 PARS Equality Center

Attorneys for Plaintiffs

13  
14  
15 ~~PROPOSED~~ ORDER

16 Pursuant to stipulation, IT IS SO ORDERED.

17  
18 Date: October 3, 2024

19   
20 LISA J. CISNEROS  
21 United States Magistrate Judge

22  
23  
24  
25  
26  
27 <sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
28 signatories listed herein concur in the filing of this document.